

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY MORRIS, TARAS KICK,  
REBECCA SALAWDEH and STACEY  
ANTALEK, on Behalf of Themselves and All  
Others Similarly Situated, : Civil Action No. 08-CV-0592(HB)  
Plaintiffs, : CLASS ACTION  
vs. : NOTICE OF MOTION AND MOTION TO  
CBS BROADCASTING, INC., CBS : ADMIT PHONG TRAN *PRO HAC VICE*  
CONSUMER PRODUCTS, PLANET TOYS, :  
INC., TOYS "R" US, INC., WALGREEN CO. :  
and HAMMACHER SCHLEMMER & CO., :  
INC., :  
Defendants. :  
X

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07/09/2008  
10:25-656184-JL

PLEASE TAKE NOTICE upon the annexed Declaration of Joseph P. Guglielmo in Support of the Motion to Admit Phong Tran *Pro Hac Vice* and the Certificate of Good Standing attached thereto, plaintiffs Jeffrey Morris, Taras Kick, Rebecca Salawdeh and Stacey Antalek move this Court, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that Phong Tran, a member of the Bar of the State of California and an associate at the law firm of Coughlin Stoia Geller Rudman & Robbins LLP, be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

DATED: June 30, 2008

WHATLEY, DRAKE & KALLAS, LLC  
JOE R. WHATLEY, JR.  
EDITH M. KALLAS  
JOSEPH P. GUGLIELMO  
ELIZABETH ROSENBERG



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Attorneys for Plaintiff Jeffrey Morris

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2008, I caused a true and correct copy of the foregoing Motion to Admit Phong Tran *pro hac vice*, Affidavit of Joseph P. Guglielmo in Support of Motion to Admit Phong Tran *pro hac vice*, Certificates of Good Standing and [Proposed] Order on Admission to Practice *Pro Hac Vice* to be sent to all attorneys of record via first class mail.

  
Elizabeth Rosenberg

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY MORRIS, TARAS KICK,  
REBECCA SALAWDEH and STACEY  
ANTALEK, on Behalf of Themselves and All  
Others Similarly Situated, : Civil Action No. 08-CV-0592(HB)  
Plaintiffs, : CLASS ACTION  
vs. : DECLARATION OF JOSEPH P.  
CBS BROADCASTING, INC., CBS : GUGLIELMO IN SUPPORT OF THE  
CONSUMER PRODUCTS, PLANET TOYS, : MOTION TO ADMIT PHONG TRAN  
INC., TOYS "R" US, INC., WALGREEN CO., : *PRO HAC VICE*  
and HAMMACHER SCHLEMMER & CO., :  
INC., :  
Defendants. :  
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I, Joseph P. Guglielmo, declare as follows:

1. I am a member in good standing of the bar of this Court and a partner at Whatley, Drake & Kallas, LLC. I make this declaration in support of plaintiffs Jeffrey Morris, Taras Kick, Rebecca Salawdeh and Stacey Antalek's Motion to Admit Phong Tran *Pro Hac Vice*, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, requesting that Phong Tran be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

2. Phong Tran is fully familiar with this action.

3. Phong Tran is an attorney in good standing of the Bar of the State of California, as evidenced by the annexed certificate.

4. I respectfully request that plaintiffs' motion be granted in all respects. A proposed order is enclosed herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 30th day of June, 2008 at New York, New York.



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JOSEPH P. GUGLIELMO



## Supreme Court of California

FREDERICK K. OHLRICH

*Clerk of the Court*

### CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

#### **PHONG LE TRAN**

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that PHONG LE TRAN was on the 8th day of December 1999, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court,  
this 17th day of June, 2008.*

**FREDERICK K. OHLRICH**

*Clerk of the Supreme Court*

By \_\_\_\_\_ Joseph Cornetta  
*Joseph Cornetta, Deputy Clerk*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY MORRIS, TARAS KICK,  
REBECCA SALAWDEH and STACEY  
ANTALEK, on Behalf of Themselves and All  
Others Similarly Situated, : Civil Action No. 08-CV-0592(HB)  
Plaintiffs, : CLASS ACTION  
vs. : [PROPOSED] ORDER GRANTING  
CBS BROADCASTING, INC., CBS : MOTION FOR ADMISSION OF PHONG  
CONSUMER PRODUCTS, PLANET TOYS, : TRAN *PRO HAC VICE*  
INC., TOYS "R" US, INC., WALGREEN CO. :  
and HAMMACHER SCHLEMMER & CO., :  
INC., :  
Defendants. :  
x

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Upon the motion of plaintiffs Jeffrey Morris, Taras Kick, Rebecca Salawdeh and Stacey Antalek pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for an order admitting Phong Tran *pro hac vice* for all purposes on behalf of plaintiffs in this action, and for good cause shown,

IT IS HEREBY ORDERED that the motion is GRANTED in all respects, subject to payment of the requisite fees.

DATED: \_\_\_\_\_

THE HONORABLE HAROLD BAER, JR.  
UNITED STATES DISTRICT JUDGE